
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY


UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
:
v. : Honorable Michael A. Hammer
:
LAWRENCE MCLENDON : Mag. No. 23-10097
:

I, Michael Delaney, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B




Michael Delaney, Special Agent
Federal Bureau of Investigation

Special Michael Delaney attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1

March 13, 2023
Date

at District of New Jersey
County and State

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One
(Bank Robbery)

On or about December 6, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

LAWRENCE MCLENDON,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Chase Bank located in New Brunswick, New Jersey, approximately \$500 in money belonging to, and in the care, custody, control, management, and possession of the Chase Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

ATTACHMENT B

I, Michael Delaney, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, photographs, and videos of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about December 6, 2022, at approximately 3:04 p.m., an older black male wearing a black jacket, black pants, black shoes, a beige paddy golf hat, and a light blue surgical mask across his mouth and nose while carrying a black umbrella, later identified as Lawrence McLendon ("McLendon" or "Defendant"), entered the Chase Bank located at 349 George Street in New Brunswick, New Jersey (the "Bank"). McLendon approached a bank teller ("Victim-1") and showed Victim-1 a note, on which was written:

I WILL SHOOT
SOMEONE
\$5000 NOW!

2. Victim-1 complied and gave McLendon approximately \$500 in cash from a cash teller drawer. McLendon then took the \$500 in cash and left the Bank around 3:07 p.m.

3. Law enforcement obtained video recordings taken by the security cameras at the Bank on the day of the robbery, as well as video recordings taken by establishments in the surrounding area.

4. Video surveillance from this same day taken from a 7-11 located on the same street block as the Bank at 358 George Street in New Brunswick, New Jersey (the "7-11"), shows the same individual—the Defendant—entering the 7-11 at 2:49 p.m., approximately 15 minutes prior to the robbery of the Bank, and purchasing a pack of cigarettes. This 7-11 video of McLendon shows him to be an older black male of similar height and weight as he is depicted in the bank robbery video, and wearing the same clothes (*i.e.*, a black jacket, black pants, black shoes, and beige paddy golf hat, while carrying a black umbrella) with a light blue surgical mask pulled below his chin. Because his light blue surgical mask is wrapped around McLendon's chin in the 7-11, the rest of his face is fully visible to the surveillance camera.

5. Law enforcement has compared known photographs of McLendon to the video from 7-11 and determined that this is the same individual.

6. The 7-11 video shows McLendon purchasing cigarettes packaged in a white box with a thick red strip down the middle and gold emblem with a green bank card (the “Bank Card”), then exiting the 7-11 at 2:51 p.m. (approximately 13 minutes prior to the robbery of the Bank) and walking south on George Street in the direction of the Bank.

7. Law enforcement determined that the cigarettes purchased by the individual identified as McLendon in the 7-11 were of the brand Maverick. Law enforcement obtained records from 7-11 relating to transactions conducted on December 6, 2022 and identified one transaction for a single box of Maverick cigarettes.

8. The Bank Card used to make that purchase was held in the name of the Defendant—Lawrence McLendon—and was associated with the same date of birth and last four digits of social security number as those of McLendon.

9. At all times relevant to this criminal complaint, the deposits of the Bank were insured by the Federal Deposit Insurance Corporation.